

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

VALENTINO DIXON,

Plaintiff,

v.

Case No. 19-cv-01678

CITY OF BUFFALO, et al.,

Defendants.

**DECLARATION OF PETER SAHASRABUDHE IN SUPPORT OF
MOTION TO SEAL**

PETER SAHASRABUDHE, under penalty of perjury and pursuant to 28 U.S.C. § 1746, declares the following to be true and correct:

1. I am an attorney associated with Hodgson Russ LLP, attorneys for the defendants the City of Buffalo (hereinafter “the City”), Mark Stambach, Raniero Masecchia, James Lonergan, John Vickerd, Richard Donovan, and various John Does identified as Unknown Buffalo Police Department Supervisors (collectively referred to hereinafter as “the City Defendants”). As an attorney of record, I am fully familiar with the proceedings in this matter and submit this declaration in support of the City Defendants’ motion to file under seal an excerpt of a reinvestigation memorandum created by the Erie County District Attorney’s Office.

2. Specifically, the document which the City Defendants’ request to file under seal is Exhibit 51 to my declaration in support of the City Defendants’ motion for summary judgment (Dkt. No. 174). The document is a less than one page excerpt from a confidential memorandum created by the Erie County District Attorney’s Office when it was reinvestigating the murder of Torriano Jackson. The excerpt details or summarizes an interview

conducted by Assistant District Attorneys with John Sullivan, an eyewitness to the Torriano Jackson murder in 1991 and an individual who testified against plaintiff, Valentino Dixon, at his criminal trial in 1992.

3. Good cause exists to file this excerpt under seal because the interview was confidential in nature and the memorandum was marked as “Attorneys’ Eyes Only” by the County of Erie, who is also a defendant in this case.

4. Upon consultation with counsel for the County, they requested that the excerpt be filed under seal.

5. Furthermore, Mr. Dixon’s counsel does not object to the excerpt being filed under seal.

6. Accordingly, no party opposes this request.

7. We thank the Court in advance for its consideration.

Dated: January 18, 2024

/s Peter A. Sahasrabudhe
Peter Sahasrabudhe